



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



**FEB 13 2015**

Mr. Larry Wannamaker  
GAF, Corporation of Texas  
6200 Zerker Road  
Shafter, Ca 93263

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-2033  
Project # 1144282**

Dear Mr. Wannamaker:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-2033-12-9 (under project S-1143090) into the Title V operating permit. The ATC authorized replacement of a asphalt roofing shingle coating operation's continuous mixer.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-2033-12-9, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: S-1144282

Engineer: David Torii  
Reviewing Engineer: Allan Phillips

Facility Number: S-2033  
Facility Name: GAF, Corporation of Texas  
Mailing Address: 6200 Zerker Road  
Shafter, Ca 93263  
Contact Name: Larry Wannamaker  
Phone: 661-391-3955

Responsible Official: Larry Wannamaker  
Title: Manager of Technical Services

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## **I. PROPOSAL**

GAF, Corporation of Texas is proposing a Title V minor permit modification to incorporate recently issued ATC S-2033-12-9 into their Title V operating permit. The ATC authorized replacement of a asphalt roofing shingle coating operation's continuous mixer.

## **II. FACILITY LOCATION**

The facility is located at 6200 Zerker Road in Shafter, CA.

## **III. EQUIPMENT DESCRIPTION**

Proposed Title V Operating Permit:

S-2033-12-11: ASPHALT ROOFING SHINGLE COATING OPERATION  
WITH MACHINE LINE FUME COLLECTION SYSTEM  
VENTED TO HIGH VELOCITY AIR FILTER (FCS-1)

## **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

## **V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

## VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Changes to the original Permits to Operate are as follows

S-2033-12-11		
Condition # on Proposed Permits Minor Modification PTOs	Condition is New, Revised, moved or Removed	Reason for Change from Current PTO
4	revised	one continuous mixer removed

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and

GAF, Corporation of Texas  
S-2033, 1144282

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

# ATTACHMENT A

Proposed Modified Title V Operating Permit  
S-2033-12-11

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-2033-12-11

**EXPIRATION DATE:** 04/30/2017

**SECTION:** 15 **TOWNSHIP:** 28S **RANGE:** 26E

**EQUIPMENT DESCRIPTION:**

ASPHALT ROOFING SHINGLE COATING OPERATION WITH MACHINE LINE FUME COLLECTION SYSTEM VENTED TO HIGH VELOCITY AIR FILTER (FCS-1)

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
3. Operation shall include Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 with 200 hp exhaust blower. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include one continuous mixer, 4000 gallon surge tank with agitator, filled coating applicator, sealdown applicator with three 2000 gallon sealdown storage and mix tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall include laminator sealdown applicator, laminator adhesive applicator, and five 250 gallon use tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include oil pump and 1000 gallon reclaim oil storage tank. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Continuous temperature monitoring equipment (with accuracy of +/- 15 degrees Celsius over its range) shall be installed at inlet of high velocity air filter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Continuous temperature monitoring results shall be maintained for District inspection upon request for at least five years. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Each tank roof appurtenance shall be maintained leak-free (no reading in excess of 10,000 ppm as methane measured at a distance of one centimeter from the source). [District Rule 4623] Federally Enforceable Through Title V Permit
10. Maximum flow rate through high velocity air filter FCS-1 shall not exceed 25,200 acfm. Flow control damper shall be maintained at setting shown to demonstrate compliance with flow limit during source testing. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Visible emissions shall not exceed 1/4 Ringelmann or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Particulate matter emissions shall not exceed 0.08 lb/ton of asphalt shingle produced. [40 CFR 60.472] Federally Enforceable Through Title V Permit
13. Emission rate from shingle coating operation shall not exceed: PM10: 0.88 lb/hr and 6638 lb/yr, and VOC: 5.04 lb/hr and 37,996 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Total quantity of coating asphalt, sealant asphalt, and laminate adhesive asphalt introduced to asphalt roofing shingle coating operation (S-2033-12) shall not exceed 657 tons/day and 206,500 tons/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rule 1070] Federally Enforceable Through Title V Permit
16. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rule 1070] Federally Enforceable Through Title V Permit
17. If permittee fails any compliance demonstration for PM10 and VOC emission limits when testing not less than once every 36 months, compliance with PM10 and VOC emission limits shall be demonstrated not less than once every 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1070] Federally Enforceable Through Title V Permit
20. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be equipped with a differential pressure monitor to continuously indicate and record the pressure drop across the filter media. [40 CFR 64.3] Federally Enforceable Through Title V Permit
22. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 27 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] Federally Enforceable Through Title V Permit
23. During each day of operation, the permittee shall record the differential pressure of the Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. Fabric collection system of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Visible emissions from Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collection system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

27. The industry is exempted from the quarterly reports required under 40 CFR 60.7. During performance testing, the operating temperature of the high velocity air filters shall be recorded and reported as required by 40 CFR 60.7 (d). Facility shall maintain a file of temperature monitoring results for at least 5 years. [40 CFR 60.473] Federally Enforceable Through Title V Permit
28. For saturators, performance tests required under 40 CFR 60.8 shall be conducted using procedures in 40 CFR 60.474 (a)-(c). [40 CFR 60.474] Federally Enforceable Through Title V Permit
29. Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Federally Enforceable Through Title V Permit
30. The administrator shall determine compliance with the standards in CFR 60.472 (a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8 (c) totaling 60 minutes. A performance test shall consist of one run. [40 CFR 60.474] Federally Enforceable Through Title V Permit
31. The owner and operator shall use the monitoring device in 60.473 (a) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results. [40 CFR 60.474] Federally Enforceable Through Title V Permit
32. Records of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070] Federally Enforceable Through Title V Permit
33. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
34. Permittee shall maintain daily records of asphalt process rate and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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**ATTACHMENT B**  
Authority to Construct Permit  
S-2033-12-9



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-2033-12-9

**ISSUANCE DATE:** 07/16/2014

**LEGAL OWNER OR OPERATOR:** ELK CORPORATION OF TEXAS

**MAILING ADDRESS:** 6200 ZERKER RD  
SHAFTER, CA 93263

**LOCATION:** 6200 ZERKER RD  
SHAFTER, CA 93263

**SECTION:** 15 **TOWNSHIP:** 28S **RANGE:** 26E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ASPHALT ROOFING SHINGLE COATING OPERATION WITH MACHINE LINE FUME COLLECTION SYSTEM VENTED TO HIGH VELOCITY AIR FILTER (FCS-1): REPLACE CONTINUOUS MIXERS

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
4. Operation shall include Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 with 200 hp exhaust blower. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall include one continuous mixer, 4000 gallon surge tank with agitator, filled coating applicator, sealdown applicator with three 2000 gallon sealdown storage and mix tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include laminator sealdown applicator, laminator adhesive applicator, and five 250 gallon use tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

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Arnaud Marjollet, Director of Permit Services

S-2033-12-9 : Feb 11 2015 7:18AM -- TORID : Joint Inspection NOT Required

7. Operation shall include oil pump and 1000 gallon reclaim oil storage tank. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Continuous temperature monitoring equipment (with accuracy of +/- 15 degrees Celsius over its range) shall be installed at inlet of high velocity air filter. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Continuous temperature monitoring results shall be maintained for District inspection upon request for at least five years. [District Rule 1070]
10. Each tank roof appurtenance shall be maintained leak-free (no reading in excess of 10,000 ppm as methane measured at a distance of one centimeter from the source). [District Rule 4623] Federally Enforceable Through Title V Permit
11. Maximum flow rate through high velocity air filter FCS-1 shall not exceed 25,200 acfm. Flow control damper shall be maintained at setting shown to demonstrate compliance with flow limit during source testing. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Visible emissions shall not exceed 1/4 Ringelmann or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.08 lb/ton of asphalt shingle produced. [40 CFR 60.472] Federally Enforceable Through Title V Permit
14. Emission rate from shingle coating operation shall not exceed: PM10: 0.88 lb/hr and 6638 lb/yr, and VOC: 5.04 lb/hr and 37,996 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total quantity of coating asphalt, sealant asphalt, and laminate adhesive asphalt introduced to asphalt roofing shingle coating operation (S-2033-12) shall not exceed 657 tons/day and 206,500 tons/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rule 1070]
17. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rule 1070]
18. If permittee fails any compliance demonstration for PM10 and VOC emission limits when testing not less than once every 36 months, compliance with PM10 and VOC emission limits shall be demonstrated not less than once every 12 months. [District Rule 1070]
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1070]
21. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
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23. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 27 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. During each day of operation, the permittee shall record the differential pressure of the Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
25. Fabric collection system of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
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28. The industry is exempted from the quarterly reports required under 40 CFR 60.7. During performance testing, the operating temperature of the high velocity air filters shall be recorded and reported as required by 40 CFR 60.7 (d). Facility shall maintain a file of temperature monitoring results for at least 5 years. [40 CFR 60.473] Federally Enforceable Through Title V Permit
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35. Permittee shall maintain daily records of asphalt process rate and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070]

# ATTACHMENT C

Previous Title V Operating Permit S-2033-12-8

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-2033-12-8

**EXPIRATION DATE:** 04/30/2017

**SECTION:** 15    **TOWNSHIP:** 28S    **RANGE:** 26E

**EQUIPMENT DESCRIPTION:**

ASPHALT ROOFING SHINGLE COATING OPERATION WITH MACHINE LINE FUME COLLECTION SYSTEM VENTED TO HIGH VELOCITY AIR FILTER (FCS-1)

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
3. Operation shall include Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 with 200 hp exhaust blower. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include two continuous mixers, 4000 gallon surge tank with agitator, filled coating applicator, sealdown applicator with three 2000 gallon sealdown storage and mix tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall include laminator sealdown applicator, laminator adhesive applicator, and five 250 gallon use tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
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23. During each day of operation, the permittee shall record the differential pressure of the Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. Fabric collection system of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Visible emissions from Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collection system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [40 CFR 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

27. The industry is exempted from the quarterly reports required under 40 CFR 60.7. During performance testing, the operating temperature of the high velocity air filters shall be recorded and reported as required by 40 CFR 60.7 (d). Facility shall maintain a file of temperature monitoring results for at least 5 years. [40 CFR 60.473] Federally Enforceable Through Title V Permit
28. For saturators, performance tests required under 40 CFR 60.8 shall be conducted using procedures in 40 CFR 60.474 (a)-(c). [40 CFR 60.474] Federally Enforceable Through Title V Permit
29. Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Federally Enforceable Through Title V Permit
30. The administrator shall determine compliance with the standards in CFR 60.472 (a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8 (c) totalling 60 minutes. A performance test shall consist of one run. [40 CFR 60.474] Federally Enforceable Through Title V Permit
31. The owner and operator shall use the monitoring device in 60.473 (a) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results. [40 CFR 60.474] Federally Enforceable Through Title V Permit
32. Records of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070]
33. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
34. Permittee shall maintain daily records of asphalt process rate and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.



# ATTACHMENT D

## Emissions Increases

SSIPE (lb/yr)				
NOx	VOC	CO	SOx	PM10
0	0	0	0	0

# ATTACHMENT F

## Application



Quality You Can  
Trust...From  
North America's  
Largest Roofing  
Manufacturer!

Larry Wanamaker  
Manager of Technical  
Services

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NOV 17 2014  
SJVAPCD  
Southern Region

November 13, 2014

Mr. Arnaud Marjollet  
Director Permit Services  
San Joaquin Valley Air Pollution Control District  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244

RE: APPLICATION TO MODIFY TITLE V PERMIT  
FACILITY S-2033

Dear Mr. Marjollet,

GAF, Elk Corporation of Texas (GAF) is required to implement Authority to Construct (ATC) S-2033-12-9 into their Title V permit pursuant to Condition #1 of this ATC. Therefore, please find attached an application form, a compliance certification form and a check in the amount of \$19.00 as required for a Title V modification of GAF's federal operating permit.

Should you have any questions concerning this application package, please do not hesitate to contact me at (661) 391-3955 or Kathy Parker of Insight Environmental Consultants (661) 282-2200.

Sincerely,

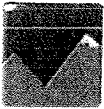
Larry Wanamaker  
Manager of Technical Services

Attachments

cc: Insight Environmental Consultants

6200 Zerker Road  
Shafter, CA 93263  
(661) 391-3955 (B)  
(661) 496-1024 (C)  
lwanamaker@gaf.com





# San Joaquin Valley Air Pollution Control District

www.valleyair.org

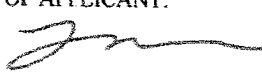
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NOV 17 2014



## Permit Application For:

SJVAPCD  
Southern Region

[ ] ADMINISTRATIVE AMENDMENT [✓] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>GAF, Elk Corporation of Texas</b>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <b>6200 Zerker Road</b>  CITY: <b>Shafter</b> STATE: <b>California</b> 9-DIGIT ZIP CODE: <b>93263</b>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <b>6200 Zerker Road</b> CITY: <b>Shafter, CA 93263</b>  1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <b>Shingle Manufacturing</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  MODIFY TITLE V PERMIT TO INCORPORATE THE FOLLOWING ATC:  <b>S-2033-12-9 Modification of Asphalt Roofing Shingle Coating Operation with Machine Line Fume Collection System Vented to High Velocity Air Filter (FCS-1)</b>	
6. TYPE OR PRINT NAME OF APPLICANT: <b>Larry Wanamaker</b>	TITLE OF APPLICANT:  <b>Manager of Technical Services</b>
7. SIGNATURE OF APPLICANT: 	DATE: <b>11/13/14</b>  PHONE: <b>(661) 391-3955</b>  EMAIL: <b>lwamaker@gaf.com</b>

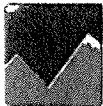
For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: <b>\$ 19.00</b>	CHECK#: <b>CASH</b>
	DATE PAID: <b>PM 11/17/14</b>	
	PROJECT NO: <b>S-1144282</b>	FACILITY ID: <b>S-2033</b>
	<b>Insight</b>	

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NOV 17 2014

SJVAPCD  
Southern Region



**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

☐ SIGNIFICANT PERMIT MODIFICATION  
☒ MINOR PERMIT MODIFICATION


☐ ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: <b>GAF Elk Corporation of Texas</b>		FACILITY ID: <b>S-2033</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility		
2. Owner's Name: <b>GAF Elk Corporation of Texas</b>		
3. Agent to the Owner: <b>Larry Wanamaker, Manager of Technical Services</b>		

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

11/13/14  
\_\_\_\_\_  
Date

**Larry Wanamaker**  
\_\_\_\_\_  
Name of Responsible Official (please print)

**Manager of Technical Services**  
\_\_\_\_\_  
Title of Responsible Official (please print)